

### **REMARKS**

Applicants thank the Examiner for the very thorough consideration given to the present application.

By this reply, claims 1, 6 and 24 are hereby amended to further define what Applicants believe to be their invention. No new matter has been added. Accordingly, claims 1, 3-7, 10, 12, 13, 24 and 26-29 are currently pending for examination. Reexamination and reconsideration of the pending claims is respectfully requested.

### **All Claim Comply with 35 U.S.C. §112**

Claims 1, 6 and 24 stand rejected under 35 U.S.C. §112, first paragraph. This rejection is respectfully traversed because the rejected phrase of “a first distance between the holes arranged along the first direction is smaller than a second distance between the holes arranged along the second direction” has been removed from claims 1, 6 and 24 by way of the foregoing amendment. Accordingly, Applicants respectfully request that the 35 U.S.C. §112, first paragraph, rejection of claims 1, 6 and 24 be withdrawn.

### **All Claims Comply with 35 U.S.C. §102 and 35 U.S.C. §103**

Claims 1, 5, 10-14, 17-21, 23-24 and 26-29 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,111,357 to Fleming et al. (hereinafter “Fleming”). Claims 1, 3-7, 24 and 26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant’s admitted prior art (AAPA), further in view of Fleming et al. These rejections are respectfully

traversed for the following reasons.

Applicants respectfully submit that Fleming does not anticipate claim 1 as amended. Independent claim 1 has been amended to positively recite a combination of features including, *inter alia*, “the holes in the counter electrode have a shape of one of a triangle and a cross”(*emphasis added*). Fleming does not teach or suggest at least the above-noted claimed feature. In Fleming, as shown in Fig 6B & 6C, the holes in the counter electrode (20) have the shape of a rectangle, square or rhombus. The claimed feature is thus clearly absent from Fleming. Further, the AAPA also fails to teach or suggest at least the above-noted claimed feature. Accordingly, both Fleming and AAPA, either singly or in combination, fail to teach or suggest at least the feature of “the holes in the counter electrode have a shape of one of a triangle and a cross,” as now recited in independent claim 1.

Similarly, independent claims 6 and 24 have been amended to positively recite a combination of features including, *inter alia*, “the holes in the counter electrode have a shape of one of a triangle and a cross” (*emphasis added*), as now recited in independent claim 1.

Accordingly, amended independent claims 1, 6 and 24 and their dependent claims 3-5, 7, 10, 12, 13 and 26-29, due to their dependency on the independent claims, are allowable over the applied art, and reconsideration and withdrawal of the 35 U.S.C §§ 102 & 103 rejections are respectfully requested.

### **CONCLUSION**

In view of the foregoing, Applicants respectfully request reconsideration and the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-4323. If a fee is required for an extension of time under 37 C.F.R. 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

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Respectfully submitted,

By /Donald L. Monin, Jr./  
Donald L. Monin, Jr.  
Registration No.: 47,256  
Holland & Knight LLP  
2099 Pennsylvania Avenue, N.W. – Suite 100  
Washington, DC 20006-6801  
(202) 419-2521 - Telephone  
(202) 955-5564 - Facsimile